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July 2, 2021

### Via ECF

Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Hernandez, et al.* – Edwin Santana  
Docket No. 18-cr-420 (ALC)

Dear Judge Carter:

We represent defendant Edwin Santana in the above-captioned matter. The Court has scheduled a sentencing hearing in Mr. Santana's case for Thursday, July 15 at 11:30 a.m. See ECF Nos. 690, 722. We write to respectfully request a temporary modification to the terms of Mr. Santana's release to allow him to travel to Florida for a family vacation before his sentencing. The trip would last from July 5 through July 10. Mr. Santana and his family would stay at an Airbnb in Kissimmee, Florida for the duration of their visit.

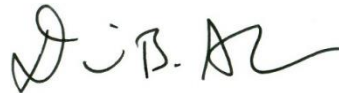
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Hon. Andrew L. Carter, Jr.  
July 2, 2021  
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Since he was released under pretrial supervision in July 2018, Mr. Santana has complied fully with the conditions of his release and has earned several favorable revisions to those conditions in light of his good behavior—enabling him to, among other things, work in other boroughs and in New Jersey; take high-school equivalency courses; care for his mother in a New Jersey hospital; and, eventually, to freely move about the city without a curfew or electronic monitoring. *See* ECF Nos. 137, 191, 207, 241. The Court has also, on several occasions, granted requests for temporary modifications to the terms of Mr. Santana's release to allow him to visit family in Puerto Rico. *See* ECF Nos. 286, 342, 680, 696.

Pretrial Services has informed us that it takes no position regarding this request, provided that Mr. Santana provides Pretrial Services with certain information regarding his travel and lodging arrangements. The government has also informed us that it takes no position regarding this request.

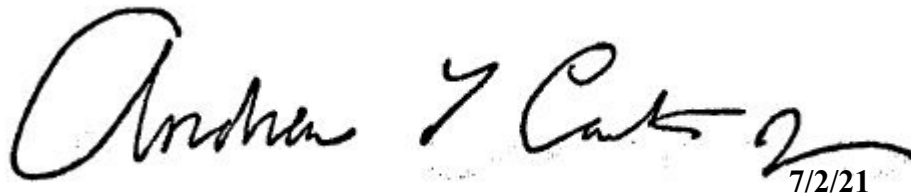
Very truly yours,



David B. Anders

cc: AUSA Christopher Clore (via ECF)  
AUSA Jacob Warren (via ECF)  
Pretrial Services Officer Courtney DeFeo (via email)

The application is **GRANTED**.  
So Ordered.

  
7/2/21